

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE )  
TATE, JEREMY S. MELTON, ISSACCA POWELL, )  
KEITH BURGESS, TRAVIS BOYD, TERRENCE )  
DRAIN, and KIMBERLY ALLEN on behalf of )  
Themselves and all similarly situated persons )

PLAINTIFFS, )

v. )

BILL OLDHAM, in his individual capacity as former )  
Sheriff of Shelby County, Tennessee; FLOYD )  
BONNER, JR., in his official capacity as Sheriff of )  
Shelby County, Tennessee; ROBERT MOORE, in his )  
individual capacity as former Jail Director of Shelby )  
County, Tennessee; KIRK FIELDS, in his official )  
capacity as Jail Director of Shelby County, Tennessee; )  
CHARLENE McGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of Shelby County, )  
Tennessee; REGINALD HUBBARD, in his official )  
capacity as Assistant Chief of Jail Security of Shelby )  
County, Tennessee; DEBRA HAMMONS, in her )  
individual capacity as former Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; TIFFANY )  
WARD in her official capacity as Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; SHELBY )  
COUNTY, TENNESSEE, a Tennessee municipality; )  
TYLER TECHNOLOGIES, INC., a foreign corporation; )  
GLOBAL TEL\*LINK CORPORATION, a foreign )  
corporation; SOFTWARE AG USA, INC., a foreign )  
corporation; and SIERRA-CEDAR, INC., a foreign )  
corporation, SIERRA SYSTEMS GROUP, INC., a )  
foreign corporation; and TETRUS CORP, a foreign )  
corporation )

DEFENDANTS. )

**Case No.: 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY,  
& INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

## NOTICE OF APPEARANCE

---

**COMES NOW** the law firm of Farris Bobango Branan PLC, Garrett M. Estep, and Robert A. McLean, and enter their appearance in the above-referenced matter on behalf of the Defendant, Tetrus Corp.

Respectfully submitted,

/s/ Robert A. McLean

Robert A. McLean

Attorney I.D. No. 6516

Garrett M. Estep

Attorney I.D. No. 19078

FARRIS BOBANGO BRANAN PLC

999 S. Shady Grove Road, Suite 500

Memphis, Tennessee 38120

(901) 259-7100

*Counsel for Defendant Tetrus Corp.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served on the following counsel of record via the Court's CM/ECF system, this 9th day of December, 2019:

Robert E. Craddock, Esq.  
Odell Horton, Jr., Esq.  
WYATT, TARRANT & COMBS, LLP  
1715 Aaron Brenner Drive, Suite 800  
Memphis, Tennessee 38120  
(901) 537-1000  
Email: rcraddock@wyattfirm.com  
Email: ohorton@wyattfirm.com

Emmett Lee Whitwell, Esq.  
SHELBY COUNTY ATTORNEY'S OFFICE  
160 N. Main Street  
Suite 950  
Memphis, TN 38103  
(901) 222-2100 Email:  
lee.whitwell@shelbycountyttn.gov

*Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee*

*Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
(901) 577-2121  
Email: btrammell@bakerdonelson.com

Beth Bivans Petronio, Esq.  
K&L GATES, LLP  
1717 Main Street  
Suite 2800  
Dallas, Texas 75201  
(214) 939-5815  
Email: beth.petronio@klgates.com

*Counsel for Defendant Tyler Technologies, Inc.*

*Counsel for Defendant Tyler Technologies, Inc.*

Douglas F. Halijan, Esq.  
William David Irvine, Esq.  
BURCH PORTER & JOHNSON  
130 N. Court Avenue  
Memphis, TN 38103-2217  
(901) 524-5000  
Email: dhalijan@bpjlaw.com  
Email: wirvine@bpjlaw.com

Russell Brandon Bundren, Esq.  
James L. Murphy, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
(615) 252-4647  
Email: bbundren@babco.com  
Email: jmurphy@bradley.com

*Counsel for Defendant Software AG Cloud Americas, Inc.*

*Counsel for Defendant Global TelLink Corporation*

Albert G. McLean, Esq.  
Kevin David Bernstein, Esq.  
SPICER RUDSTROM PLLC  
119 S. Main Street, Suite 700  
Memphis, TN 38103  
901-522-2324  
Email: amclean@spicerfirm.com  
Email: kdb@spicerfirm.com

*Counsel for Defendant Sierra-Cedar, Inc.*

Jessalyn H. Zeigler, Esq.  
Michael P. Kapellas, Esq.  
BASS, BERRY & SIMS,  
150 Third Avenue South  
Suite 2800  
Nashville, TN 37201  
(615) 742-6289  
Email: jzeigler@bassberry.com  
Email: mkapellas@bassberry.com  
*Counsel for Defendant Sierra Systems Group,  
Inc.*

/s/ Robert A. McLean

G:\RAM\Tetrus\court papers\Notice of Appearance - RAM, GME & FBB.doc